

Exhibit 1

From: Pearl, David <dpearl@axinn.com>
Sent: Friday, April 26, 2024 9:34 PM
To: Geraldine W. Young; SALEM, Sara; Audrey Moore; Hunsberger, James K.; SESSIONS, Justina (JKS); Justus, Bradley; Paul Yetter; Bracewell, Mollie; MAHR, Eric (EJM); MCCALLUM, Robert; ELMER, Julie (JSE); Bitton, Daniel S.; Vissichelli, Allison M.; Bryce Callahan; EWALT, Andrew (AJE); VACA, Lauren
Cc: Zeke DeRose III; Jonathan.Wilkerson; Alex J. Brown; Marc B. Collier; John McBride; Peter M. Hillegas; Trevor.Young; Noah Heinz; Zina Bash; Joseph M. Graham Jr.; Ashley Keller; Brooke Smith; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez; NRFAdTech; James R. Hall; Melonie DeRose; GARRETT, Tyler; LARITZ, Tina
Subject: RE: State of Texas v Google - Deposition Notices

All,

Mr. [REDACTED] is actually not available for a deposition next Wednesday, May 1. We will be offering him instead on either Thursday, May 2 or Friday May 3 – we will follow up at the beginning of next week to confirm which of those two days he will be available.

Have a nice weekend,

David

David Pearl
Partner



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Washington, DC 20036
Office 202.469.3514
Mobile 310.733.8444
dpearl@axinn.com
Axinn.com

55 Second Street
San Francisco, CA 94105

Pronouns | He, Him, His

From: Pearl, David <dpearl@axinn.com>
Sent: Wednesday, April 24, 2024 8:26 PM
To: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; SALEM, Sara <Sara.Salem@freshfields.com>; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; Hunsberger, James K. <jhunsberger@axinn.com>; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Justus, Bradley <bjustus@axinn.com>; Paul Yetter

<pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Bitton, Daniel S. <dbitton@axinn.com>; Vissichelli, Allison M. <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>
Cc: Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan.Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor.Young <Trevor.Young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; NRFAdTech <NRFAdTech@nortonrosefulbright.com>; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; LARITZ, Tina <Tina.LaRitz@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

All,

██████████ will be available for a deposition next Wednesday, May 1, at 9 AM ET, either remotely or in person in New York. If you would like to take his deposition in person, we will follow up with the exact location.

Thanks,

David

David Pearl
Partner

AXINN

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Mobile 310.733.8444
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55 Second Street
San Francisco, CA 94105

Pronouns | He, Him, His

From: Geraldine W. Young <geraldine.young@nortonrosefulbright.com>

Sent: Wednesday, April 24, 2024 4:46 PM

To: SALEM, Sara <Sara.Salem@freshfields.com>; Audrey Moore <Audrey.Moore@LanierLawFirm.com>; Pearl, David <dpearl@axinn.com>; Hunsberger, James K. <jhunsberger@axinn.com>; SESSIONS, Justina (JKS)

<Justina.Sessions@freshfields.com>; Justus, Bradley <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Bitton, Daniel S. <dbitton@axinn.com>; Vissichelli, Allison M. <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>

Cc: Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan.Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor.Young <Trevor.Young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; NRFAdTech <NRFAdTech@nortonrosefulbright.com>; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; LARITZ, Tina <Tina.LaRitz@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

Caution: External Email

Caution: External Email

Counsel:

You have provided us less than 48 hours' notice of Ms. [REDACTED]'s deposition. We request that for any future depositions that we be provided at least 3 days' notice. As you know, there are still a number of 30(b)(1) and 30(b)(6) depositions and topics that have not been scheduled.

We also request that you confirm that Google has completed its production of custodial documents and all related metadata for Ms. [REDACTED] (as well as for all upcoming scheduled depositions including Mr. [REDACTED]).

If that is the case, we will take Ms. [REDACTED]'s deposition remotely on Friday April 26 but request a slightly later start time at 10 am ET (which is still less than 48 hours from your email below), due to pre-existing conflicts on our end. Please confirm that start time will work and we will be able to depose Ms. [REDACTED] for up to 7 hours on the record, and we will make the arrangements and send you all the zoom link for the deposition.

Thank you,
Geraldine

From: SALEM, Sara <Sara.Salem@freshfields.com>

Sent: Wednesday, April 24, 2024 11:46 AM

To: Audrey Moore <Audrey.Moore@LanierLawFirm.com>; dpearl@axinn.com; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>

Cc: Zeke DeRose III <zeke.derose@lanierlawfirm.com>; Jonathan.Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>

Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor Young <Trevor.Young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; NRFAdTech <NRFAdTech@nortonrosefulbright.com>; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>; LARITZ, Tina <Tina.LaRitz@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

[External Email – Use Caution]

Counsel –

██████████ is available for a deposition on April 26, 2024 beginning at 9am ET remotely or at Freshfields New York office.

Best,
Sara

Sara Salem
Senior Associate
T +1 202 777 4529 | M +1 202 853 0381

From: SALEM, Sara

Sent: Monday, April 22, 2024 1:31 PM

To: Audrey Moore <Audrey.Moore@LanierLawFirm.com>; dpearl@axinn.com; jhunsberger@axinn.com; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.VACA@freshfields.com>

Cc: Zeke DeRose III <Zeke.DeRose@LanierLawFirm.com>; Jonathan Wilkerson <Jonathan.Wilkerson@LanierLawFirm.com>; Alex J. Brown <Alex.Brown@LanierLawFirm.com>; Marc B. Collier <marc.collier@nortonrosefulbright.com>; John McBride <john.mcbride@nortonrosefulbright.com>; Peter M. Hillegas <peter.hillegas@nortonrosefulbright.com>; Trevor Young <trevor.young@oag.texas.gov>; Noah Heinz <Noah.Heinz@kellerpostman.com>; Zina Bash <zina.bash@kellerpostman.com>; Joseph M. Graham Jr. <joseph.graham@nortonrosefulbright.com>; Ashley Keller <ack@kellerpostman.com>; Brooke Smith <brooke.smith@kellerlenkner.com>; jdugan@dugan-lawfirm.com; Isabela Pena-Gonzalez <isabela.pena-gonzalez@nortonrosefulbright.com>; Geraldine W. Young <geraldine.young@nortonrosefulbright.com>; NRFAdTech <NRFAdTech@nortonrosefulbright.com>; James R. Hall <james.hall@nortonrosefulbright.com>; Melonie DeRose <Melonie.DeRose@LanierLawFirm.com>; GARRETT, Tyler <Tyler.Garrett@freshfields.com>

Subject: RE: State of Texas v Google - Deposition Notices

Counsel –

I write with an update on ██████████'s availability. Mr. ██████████ is available for a deposition on May 1, 2024 beginning at 9am PT remotely or at Freshfields Redwood City office.

Best,

Sara

Sara Salem

Senior Associate

T +1 202 777 4529 | M +1 202 853 0381

From: Audrey Moore <Audrey.Moore@LanierLawFirm.com>

Sent: Wednesday, April 17, 2024 8:16 PM

To: dpearl@axinn.com; jhunsberger@axinn.com; SALEM, Sara <Sara.Salem@freshfields.com>; SESSIONS, Justina (JKS) <Justina.Sessions@freshfields.com>; Bradley Justus <bjustus@axinn.com>; Paul Yetter <pyetter@yettercoleman.com>; Bracewell, Mollie <mbracewell@yettercoleman.com>; MAHR, Eric (EJM) <Eric.MAHR@freshfields.com>; MCCALLUM, Robert <rob.mccallum@freshfields.com>; ELMER, Julie (JSE) <Julie.Elmer@freshfields.com>; Daniel Bitton <dbitton@axinn.com>; Ali Vissichelli <avissichelli@axinn.com>; Bryce Callahan <bcallahan@yettercoleman.com>; EWALT, Andrew (AJE) <Andrew.Ewalt@freshfields.com>; VACA, Lauren <Lauren.Vaca@freshfields.com>

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Subject: RE: State of Texas v Google - Deposition Notices

Counsel,

The Plaintiff States hereby serve the attached Notices of Deposition for the following deponents in the *State of Texas et al. v. Google LLC* case, No. 4:20-cv-00957-SDJ:

- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]
- [REDACTED]

Thank you.

Audrey



Audrey Moore

Paralegal

p: 713-659-5200

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